

# Plaintiff's Second Request for Production of Documents

Case 1:07-cv-05691-NRB Document 36-9 Filed 09/03/2008 Page 1 of 6

Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Mon, May 19, 2008 at 10:47

AM

To: "numoh@umohlaw.com" <numoh@umohlaw.com>

Dear Uwem:

We did not receive your client's Second Request for Production of Documents on April 4, or at any time prior to 5:45 pm on May 16. Although this is way past the date by which they were required to be served, we nonetheless will respond within the time proscribed by the Federal Rules. Please note all of the requested documents in our clients' possession previously have been produced to you in response to requests served by both plaintiff and the co-defendants.

Since your client is not available on the May dates we proffered, please provide at least two dates for your client's deposition during the week of June 2.

Thanks.

Deborah

—  
MartinNorcross LLC  
60 Marion Road West  
Princeton, NJ 08540  
(609) 249-5860  
(609) 945-3912 Fax  
dmnorcross@martinnorcross.com

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## Mann v. Plus One, etc.

2 messages

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Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Mon, May 12, 2008 at 11:55 AM

To: "numoh@umohlaw.com" <numoh@umohlaw.com>, "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Please see attached.

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(609) 249-5860  
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dmnorcross@martinnorcross.com

 05-12-08.Rule30(b)(6)Designation.PlusOneEtAl.doc  
34K

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numoh@umohlaw.com <numoh@umohlaw.com>

Fri, May 16, 2008 at 5:45 PM

To: HDERSCHOWITZ@lskdnylaw.com, Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Hi Deborah:

Attached is my response to your May 9, 2008 letter. Also, please check for the email I send you on April 4, 2008 that included plaintiff's second set of document requests. The email is also included at the bottom of this email, and the document requests are attached.

Uwem I. Umoh  
255 Livingston Street,  
4th Floor  
Brooklyn, NY 11217  
718.360.0527  
718.360.1916 (Fax)

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----- Original Message -----

Subject: RE: Mann v. Plus One, etc.  
From: numoh@umohlaw.com  
Date: Fri, April 04, 2008 9:57 pm  
To: Deborah MartinNorcross <dmnorcross@martinnorcross.com>

I sent it the same day I sent Harold's. I'll send another copy.

Attached are plaintiff's second set of document requests to Plus One.

Uwem I. Umoh  
255 Livingston Street,  
4th Floor  
Brooklyn, NY 11217  
718.360.0527  
718.360.1916 (Fax)

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----- Original Message -----

Subject: Re: Mann v. Plus One, etc.  
From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>  
Date: Fri, April 04, 2008 6:13 pm  
To: numoh@umohlaw.com

I have not received anything from you in any of our offices since we got the music disk. Apparently, you did not send it at the same time you most recently sent it to Harold? Please send another copy to my Edison, New Jersey office, where I will be next week. The address is

MartinNorcross LLC  
RCG Suite, 14th Floor  
379 Thornall Street  
Edison, NJ 08837

On Thu, Apr 3, 2008 at 3:12 PM, <numoh@umohlaw.com> wrote:

I sent a replacement after that in a padded envelope. That was also sent weeks ago to your Nyc office I believe.  
Sent via BlackBerry from T-Mobile

-----Original Message-----

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>

Date: Thu, 3 Apr 2008 08:35:40  
To: numoh@umohlaw.com  
Subject: Re: Mann v. Plus One, etc.

The one you sent weeks ago to my NYC office was the one with nothing but music on it.

When and where did you send the replacement CD?

On Wed, Apr 2, 2008 at 11:10 PM, <numoh@umohlaw.com>  
<mailto:numoh@umohlaw.com> > wrote:

It was not sent by certified mail so I'm not sure, but I believe it was sent to the NY office.  
This was some weeks ago

Uwem I. Umoh  
255 Livingston Street,  
4th Floor  
Brooklyn, NY 11217  
718.360.0527  
718.360.1916 (Fax)

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----- Original Message -----

Subject: Re: Mann v. Plus One, etc.

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>  
<mailto:dmnorcross@martinnorcross.com> >

Date: Wed, April 02, 2008 8:53 am

To: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>  
<mailto:HDERSCHOWITZ@lskdnylaw.com> >

Cc: numoh@umohlaw.com <mailto:numoh@umohlaw.com>

I agree with Harold's additional requested changes. Uwem, to which of my offices did you send the CD?

deborah

On Tue, Apr 1, 2008 at 11:19 AM, Harold Derschowitz (x263) <  
<mailto:HDERSCHOWITZ@lskdnylaw.com> HDERSCHOWITZ@lskdnylaw.com>  
wrote:

Dear Deborah and Uwem: I have reviewed plaintiff's proposed revised scheduling order and co-defendants' proposed changes. I am in agreement with Deborah's proposed changes thereto, and would additionally request that the "end of factual discovery" be by JUNE 30, 2008. Please let me know your thoughts as to same. Uwem, I have now

received the updated CD from your office -- please provide me with the date, time and location of the conversation contained thereon, and the participants of same, and allow this letter to serve as my formal demand for same. Thanks.

Sincerely,

HAROLD J. DERSCHOWITZ, ESQ.

Lester Schwab Katz & Dwyer, LLP

120 Broadway

New York, N.Y. 10271

Tel: (212) 341-4263

Fax: (212) 267-5916

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From: Deborah MartinNorcross [mailto:<mailto:dmnorcross@martinnorcross.com>  
dmnorcross@martinnorcross.com]

Sent: Tuesday, April 01, 2008 9:27 AM

To: <mailto:numoh@umohlaw.com> numoh@umohlaw.com; Harold Derschowitz (x263)

Subject: Mann v. Plus One, etc.

Here are my proposed changes.

-  
MartinNorcross LLC  
60 Marion Road West  
Princeton, NJ 08540  
(609) 249-5860  
(609) 945-3912 Fax

<mailto:dmnorcross@martinnorcross.com> dmnorcross@martinnorcross.com

\*\*\*\*\*  
Lester Schwab Katz & Dwyer, LLP

<http://www.lskdnylaw.com/> http://www.lskdnylaw.com

New York: (212) 964-6611

New Jersey: (973) 912-9501

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## 2 attachments



**Document Requests--Plus One and MacDonald.doc**

42K



**Discovery letter Mann.doc**

54K